

## REMARKS

Please cancel Claims 3, 6, 14, 17 and 24-25 without prejudice. Claims 1-2, 4-5, 7-13, 15-16, 18-23 and 26-30 are pending. Claims 1, 7, 12, 18, 22 and 26 are amended herein. No new matter is added as a result of the claim amendments.

### 102 Rejections

The instant Office Action states that Claims 1-2, 4-5, 7-13, 15-16, 18-23 and 26-30 are rejected under 35 U.S.C. § 102(b) as being anticipated by Saito (U.S. Patent No. 6,275,889). The Applicants have reviewed the cited reference and respectfully submit that the present invention as recited in Claims 1-2, 4-5, 7-13, 15-16, 18-23 and 26-30 is not shown or suggested by Saito.

Independent Claim 1 recites that an embodiment of the present invention is directed to “a method for establishing a connection between devices in a network, said method comprising: identifying a first device selected from a first listing of devices ...; selecting an input plug for said first device from a listing of input plugs for said first device, said listing of input plugs derived from state information read from said first device and not written to memory in said controller device; identifying a second device selected from a second listing of devices ...; selecting an output plug for said second device from a listing of output plugs for said second device, said listing of output plugs derived from state information read from said second device and not written to memory in said controller device” (emphasis added). Claims 2, 4-5 and 7-11 are dependent on Claim 1 and recite additional limitations.

Independent Claim 12 recites that an embodiment of the present invention is directed to “A controller device for establishing a connection between devices in a network, said controller device comprising: a user interface comprising an input-select element and an output-select element; wherein said input-select element is operable ... to cause an input plug for said first device to be selected from a listing of input plugs for said first device, ... wherein said listing of input plugs is derived from state information read from said first device but not written to memory in said controller device; wherein said output-select element is operable ... to cause an output plug for said second device to be selected from a listing of output plugs for said second device, ... wherein said listing of output plugs is derived from state information read from said second device but not written to memory in said controller device” (emphasis added). Claims 13, 15-16 and 18-21 are dependent on Claim 12 and recite additional limitations.

Independent Claim 22 recites that an embodiment of the present invention is directed to “A controller device for establishing a connection between devices in a network, said controller device comprising: means for identifying a first device selected from a first listing of devices ...; means for selecting an input plug for said first device from a listing of input plugs for said first device, said listing of input plugs derived from state information read from said first device and not written to memory in said controller device; means for identifying a second device selected from a second listing of devices ...; means for selecting an output plug for said second device from a listing of output plugs for said second device, said listing of output plugs derived from state information read from said second device and not written to memory in said controller device” (emphasis added). Claims 23 and 26-30 are dependent on Claim 22 and recite additional limitations.

Saito describes establishing a connection between devices only at column 9, lines 36-65. Applicants respectfully submit that neither this portion of Saito, nor Saito in its entirety, shows or suggests the claim limitations cited above.

Furthermore, Applicants respectfully assert that Saito is directed to a connection control apparatus that, in contrast to the present claimed invention, serves as a repository for connection information. That is, Applicants respectfully assert that, in contrast to the present claimed invention, the purpose of Saito's connection control apparatus is to collect and store connection information (that can be analyzed to judge which connection control apparatus controls which audio visual device). Therefore, Applicants respectfully submit that, at best, Saito provides an example of the prior art described in the Background Art section of the instant application. For instance, lines 18-20 on page 6 of the instant application state "the workload required by the controller is quite extensive. In the prior art, the controller is required to retrieve the connection information, analyze it, and store it in memory."

In summary, Applicants respectfully submit that Saito does not show or suggest the present invention as recited in independent Claims 1, 12 and 22. As such, Applicants respectfully submit that Saito also does not show or suggest the present invention as recited in Claims 2, 4-5, 7-11, 13, 15-16, 18-21, 23 and 26-30, as these claims include the limitations of Claims 1, 12 or 22 and also include additional limitations. Therefore, the Applicants respectfully assert that the basis for rejecting Claims 1-2, 4-5, 7-13, 15-16, 18-23 and 26-30 under 35 U.S.C. § 102(b) is traversed and that these claims are in condition for allowance.

### Conclusions

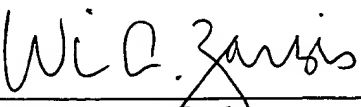
In light of the above remarks, reconsideration of the rejected claims is respectfully requested. Based on the arguments presented above, it is respectfully asserted that Claims 1-2, 4-5, 7-13, 15-16, 18-23 and 26-30 overcome the rejections of record and, therefore, allowance of these claims is respectfully solicited.

The Applicants have reviewed the references cited but not relied upon. The Applicants did not find these references to show or suggest the present claimed invention: U.S. Patent Nos. 5,883,621, 6,243,707, 6,480,889, and 6,546,419; and U.S. Patent Application Publication No. 2003/0071842. Applicants respectfully note that the following reference was, at the time the invention of the instant application was made, subject to an obligation of assignment to the same assignee: U.S. Patent No. 6,584,496.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,  
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